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October 23, 2012

Via Federal Express/Mail/E-Mail

Mr. Jeff S. Jordan
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Rc: Matter Under Review 6634

Dear Mr. Jordan:

This letter and the enclosed witness declaration are submitted in response to a complaint filed by Bonnie Girard. The complaint alleged that one or more Republican Party committees at the state or local level in Virginia received an in-kind contribution of a telephone calling and data system from the Forbes for Congress Committee and failed to report receipt of the contribution. The only local Republican committee specifically referenced in the complaint was the Colonial Heights Republican Committee.

As a threshold matter, the Colonial Heights Republican Committee is a local party committee in Virginia that does not operate a federal political committee. I represent the Republican Party of Virginia, a state political party committee. The two entities are affiliated, but the Colonial Heights Republican Committee is a distinct entity. I do not believe that the Colonial Heights Republican Party Committee received any notice of the complaint. However, in light of the response below and the enclosed witness declaration, the complaint can be dismissed without further inquiry.

Enclosed is a sworn declaration of Col. William Flanagan who attended the April 23, 2012 meeting of the Colonial Heights Republican Committee discussed in the complaint. It appears that the complainant confused a discussion of the Forbes telephone calling and data system with discussion of a Republican Party-sponsored voter identification call program. At no time following the April 23 meeting did the Forbes campaign donate a telephone or calling system to the Colonial Heights Republican Committee. On information and belief, the Forbes

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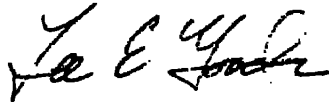
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campaign invited Party members to come to the Forbes campaign headquarters as volunteers to make pro-Forbes calls, but did not turn over the telephone system to the Colonial Heights Republican Committee or any other Republican Party committee for its own use. Meanwhile, Party members participated in a volunteer program to identify voters using telephones provided by the Republican Party of Virginia. There were two different telephone calling programs in place, and the Forbes campaign operated its own call program with its own telephones.

We trust this information corrects the facts misunderstood by the complainant and places the circumstances of local party volunteer calling programs into proper context. Accordingly, the complaint must be dismissed.

Sincerely,



Lee E. Goodman
General Counsel

Enclosure

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